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5  
6 Attorney for Defendant  
CHRISTOPHER JACKSON

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8  
9 IN THE UNITED STATES DISTRICT COURT  
10 FOR THE EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA, ) NO. 2:11-cr-0054-TLN  
12 )  
Plaintiff, )  
13 )  
v. ) STIPULATION AND ORDER TO MODIFY  
14 ) RELEASE CONDITIONS  
CHRISTOPHER JACKSON, ) (to change surety)  
15 )  
Defendants. ) Date: N/A  
16 ) Time: N/A  
Judge: Hon. Carolyn K. Delaney

17 CHRISTOPHER JACKSON, by and through his attorney, DOUGLAS BEEVERS, Assistant Federal  
18 Defender, and the United States by Assistant Attorney Matthew Segal stipulate that the release conditions in  
19 the above caption case be modified to permit change in sureties.

20 Mr. Jackson was released originally on November 15, 2010 by the Honorable Gregory H. Hollows,  
21 over the Government's objection to the third party custody of his sister Yvette Glover without any bond  
22 condition for two days. On November 17, 2010, Judge Hollows released Mr. Jackson (without Government  
23 objection) on \$100,000 bond which was secured by \$50,000 in real estate equity by his parents and an  
24 unsecured bond of \$50,000 co-signed by Mr. Jackson's sister Yvette Glover and Wendy Rose. The parties  
25 request that Ms. Glover be relieved from the bond condition and responsibilities and that Mr. Jackson move  
26 out of her property. Mr. Jackson's parents and Wendy Rose have agreed to sign larger bond to make up the  
27 difference. Wendy Rose is the mother of Mr. Jackson's child, and she is employed by the state of California.  
28 Mr. Jackson's parents own a home in Sacramento and a lien for the \$50,000 in equity has been posted.

1 According to zillow, the home still has sufficient equity to cover the \$50,000 bond. Ms. Rose is employed.

2 The parties request that the release conditions be modified to allow release on condition that Wendy  
3 Rose sign an unsecured bond of \$50,000, and that Mr. Jackson's release conditions be modified to order that  
4 he change his residence by May 10, 2013 at 9:00 a.m. All other conditions are to remain in effect.

5 Dated: May 8, 2013

Respectfully submitted,

6 HEATHER E. WILLIAMS  
Federal Defender

7 /s/ Douglas Beevers  
8 DOUGLAS BEEVERS  
Assistant Federal Defender  
9 Attorney for Defendant  
10 CHRISTOPHER JACKSON

11 Dated: May 8, 2013

BENJAMIN B. WAGNER  
United States Attorney

12 /s/ Matthew Segal  
13 MATTHEW SEGAL  
Assistant U.S. Attorney

14 **Order**

15 The matter coming before the Court on the stipulation of the parties to modify the conditions of  
16 release, and it appearing that the proposed release conditions are reasonable. It is ordered that the release  
17 conditions for Christopher Jackson are modified to allow release subject to the original conditions with the  
18 following modifications.

- 19 1. Wendy Rose to sign as unsecured surety for \$50,000;  
20 2. Yvette Glover will be released as surety as soon as the unsecured bond signed by Wendy Rose is filed  
21 with the Court; and  
22 3. Christopher Jackson is ordered to change his residence to an address approved by his probation officer  
23 by May 10, 2013 at 9:00 a.m.  
24

25 Dated: May 9, 2013

26 Carolyn K. Delaney  
27 CAROLYN K. DELANEY  
UNITED STATES MAGISTRATE JUDGE